REMARKS

In the application claims 21, 23, 24, 27-29, 31, 34-36, 39, 44, 46, 48-50, 56-58, 64, and 65 remain pending. Claims 1-20, 22, 25, 26, 30, 32, 33, 37, 38, 40-43, 45, 47, 51-55, and 59-63 have been canceled. The pending, previously presented claims remaining in the application have been amended to generally include elements of previously presented claim 22. Claims 64 and 65 have been added by amendment and generally include elements of previously presented claims 48 and 51. As such, support for the claim amendments is found in the specification, figures, and claims as filed and no new matter has been added.

In the Office Action all of the pending claims were rejected under 35 U.S.C. § 102 as allegedly being anticipated by Mott (U.S. Patent No. 6,170,060). The reconsideration of the rejection of the claims is, however, respectfully requested.

In rejecting the claims it was asserted that Mott discloses a local server (or equivalent) in client computer system 214, a remote facility (or equivalent) storing content to be downloaded to the local server via a WAN in library server 260, and a device for receiving downloaded content from the local server via a LAN in playback device 212. It is, however, respectfully noted that, while Mott does disclose a system in which playable content is transferred from the library server 260 to the client computer system 214 *on demand* (Col. 5, lines 32-39) whereupon the downloaded, playable content is transferred, via mobile device interface 221, to *any/all* client device(s) coupled to the client computer system 214 (Col. 5, lines 15-31), Mott makes no mention of interacting with the client computer system 214 to establish a "schedule" for delivering content *from the client computer system 214 to a playback device 212 <u>after</u>* content is downloaded from the library server 260 to the client computer system 214 or interacting with the client computer system 214 to associate a particular playback device with content *<u>to be</u> downloaded* (i.e., before downloading) for the purpose of automatically delivering content to a playback device *when content is actually*

downloaded from the library server 260 to the client computer system 214 as is claimed. To the extent that Mott generally describes that client identifiers are used "to target content for playback on individual mobile playback devices 212" (Col. 8, lines 17-19), it is respectfully noted that this general disclosure fails to have any relevance to the invention claimed. In this regard, Mott particularly describes that "targeting content" is nothing more than a means/method for using client identifiers to limit the ability to playback any content that has been downloaded into an unauthorized mobile playback device 212. (Col. 12, lines 19-22; Col. 13, lines 44-57).

From the foregoing it is respectfully submitted that it is evident that Mott fails to disclose, teach, or suggest each and every element, considering each and every word, of the claims as is required to maintain a rejection under 35 U.S.C. §§ 102 and 103. In particular, it is respectfully submitted that Mott fails to disclose, teach, or suggest a local server being provided with input, via a GUI or otherwise, the functions to *schedule* the automatic delivery of content from the local server to a playback device after content is downloaded to the local server from a library server via a WAN or a local server being provided with input, via a GUI or otherwise, that functions to *pre-associate* a playback device with content that is to be downloaded to thereby automatically deliver content to that playback device when content is actually downloaded to the local server from a library server via a WAN as is claimed. For at least these reasons it is respectfully submitted that the rejection of the claims must be withdrawn.

Respectfully Submitted;

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